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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ANITA D. PARATLEY,)	CASE NO. C-05-4312 (MMC)
)	
Plaintiff,)	[San Francisco County Superior
)	Court Case No. 05-445379]
vs.)	
)	
CONSECO HEALTH INSURANCE)	STIPULATION AND ORDER EXPANDING
COMPANY and DOES 1 through)	THE STIPULATED PROTECTIVE ORDER
10,)	PREVIOUSLY ISSUED BY THIS COURT
inclusive,)	TO ENCOMPASS ADDITIONAL
Defendants.)	DOCUMENTS
_____)	Assigned to: The Honorable
)	Maxine M. Chesney

STIPULATION

It is stipulated, by and between the parties to the above entitled action, by and between their attorneys of record, as follows:

This purpose of this stipulation is to expand the terms of the Stipulated Protective Order, adopted as Order of this Court on February 8, 2006, to safeguard against the disclosure of additional confidential and/or proprietary Discovery Material, not previously safeguarded under the terms of the Stipulated Protective Order.

1 The parties hereinafter wish to expand the Stipulated
2 Protective Order as follows:

3
4 1. Paragraph 1 of the Stipulated Protective Order, adopted
5 as Order of this Court on February 8, 2006, is expanded such that
6 it is now applicable to all discovery produced by the parties in
7 this action which contain information which is private,
8 confidential and/or trade secret, including all writings and
9 information contained therein (as defined in Federal Rules of
10 Evidence, Rule 1001), including but not limited to documents,
11 deposition testimony, deposition exhibits, and interrogatory
12 responses (the "Discovery Material").

13
14 2. If any party in good faith disagrees with the
15 designation of Discovery Material produced by any other party or
16 third party, as CONFIDENTIAL, that party may seek court
17 intervention for a determination as to whether the Discovery
18 Material in question is entitled to protection from public
19 disclosure under governing law. Any material designated as
20 CONFIDENTIAL, retains all the protections afforded it by the
21 protective order, unless and until such time as a court of
22 competent jurisdiction makes a final determination that the
23 Discovery Material in question is not entitled to such
24 protections.

25
26 3. The parties and their respective attorneys are in
27 agreement concerning the above terms of this Stipulated
28 Protective Order as acknowledged hereafter by the signatures of

1 the attorneys for the parties, and request the Court to enter
2 this Stipulation and Order.

3
4 DATED: April 28 , 2006

LAW OFFICES OF MARC J. WODIN

5
6 By: _____
7 /s/ MARC J. WODIN
8 Attorneys for Defendant CONSECO
9 HEALTH INSURANCE COMPANY

10
11 DATED: April 27 , 2006


FRIEDMAN, RUBIN & WHITE, LLP

12 By: _____
13 /s/ MICHAEL WHITE
14 Attorney for Plaintiff ANITA D.
15 PARATLEY

16 **ORDER**

17 Upon due consideration of the Stipulation and Order
18 Expanding the Stipulated Protective Order Previously Issued by
19 this Court, IT IS HEREBY ADOPTED AS ORDER OF THIS COURT.

20 DATED: May 1, 2006

21 
22 THE HONORABLE MAXINE M. CHESNEY
23 DISTRICT JUDGE OF THE UNITED
24 STATES DISTRICT COURT for the
25 NORTHERN DISTRICT OF CALIFORNIA